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June 21, 2024

VIA ECF

Donald L. Cabell
Chief Magistrate Judge
U.S. District Court, District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

RE: *In the Matter of the Extradition of T.C.*, Docket No. 24-mj-01365-DLC

Dear Judge Cabell:

This letter is for the purpose of augmenting our proffer of conditions of release that were identified during yesterday's hearing. As to the proffer of a mortgage/lien on T.C.'s father's property in Turkey, which is valued at over \$2 million according to the owner, I attach the appearance bond conditions in *United States v. Edward Pennings*, Docket No. 16-CR-10094-LTS (D. Mass) (Dkt. 54), and *United States v. Roger Knox*, Docket No. 18-CR-10385-NMG (D. Mass) (Dkt. 158), where foreign property secured their appearances. I am informed by counsel that in *United States v. Vorley*, Docket No. 18-cr-00035 (N.D. Ill.) (Dkt. 22), foreign property similarly secured defendant *Vorley's* bond (the details of the bond are not publicly available on Pacer). If this Honorable Court believes that the Turkish property is necessary to assure T.C.'s compliance with conditions of release, a mortgage/lien of this property is available and could be incorporated into any release order.

Yours Truly,

Martin G. Weinberg
Victoria Kelleher
Counsel for T.C.